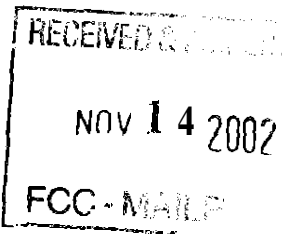


November 9, 2002

Dale E. Reich
141 North Center Street
Seville, Ohio 44273 - 9504



Telephone (330) 769-3071 & 11 Rings Far Machine

Federal Communications Commission
Attn: Marlene H. Dortch, Secretary of Commission
OFFICE of the SECRETARY
445 - - - 12th Street - - - S.W.
Washington, D.C. 20554

PART 97
RM
REQUEST

Dear Secretary:

Enclosed you find the required original and the number of required copy's as per the information I have.

The Public Library Computer that was used has no direct control over the type size in point value. All it has is Very Small - Small - Medium - Large - Extra Large. I used the size that was close to the 12 point value.

This request for a Rule Making Docket Number is submitted in the best form that I can do at present having limited communications "H" problems, so I hope it meets the need requirements.

The basic requirements for format & content I suspect have been complied with I suspect. If you should have any questions please feel free to communicate.

Thanks

Dale Reich

No. of Copies made
List ABOVE

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WTB

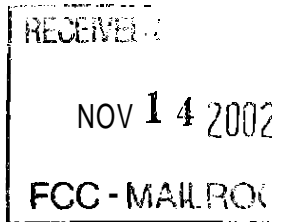
02-277

**Before the
Federal Communications Commission
Washington, D. C. 20554**

PETITION FOR RULE'S CHANGE

Petitioner)
Dale E Reich)
141 North Center Street)
Seville, Ohio 44273 - 9504)

RM Docket Number _____



This is a request for changes in Part 97 of the FCC rule's and regulations that govern Amateur Radio Service. There was a move several years ago for the conversion of the current licensing system from 7 licenses to only 3 this was long over due. What the FCC Commissioners and FCC staff did not address or see at the time of the conversion the number of Novice and Advanced Licenses still in the renewal years for the future. This request if for a "Merit" credit, along with service credit to allow some of the remaining Novice and Advanced to advanced to the next class with out taking a exam due to the previous tougher exam that was past administered, and credit for service with out serious FCC violation also as a element.

The application for the "Merit 8 Service Upgrade" could only be did by a authorized VEC 8 VE system. The same application fee as the upgrade exam would apply for the application. There would be no certificate issued by the VEC / VE as the final merit upgrade would be at the FCC offices upon review and approval or rejection of the application.

Novices with +20 years Credit would be issued a "Technicians Class" license, but under the the Restriction it would be noted under Special Conditions 8 Endorsements that this is a "Conditional Merit 8 Service Upgrade" The Technicians License shall include all previous privileges of the Novice 8 Expanded areas listed in Part 97!

Advanced Class would with +20 years of Total Amateur Credit would be granted a "Extra Class" license that would be marked "Conditional Merit 8 Service Upgrade" under remarks.

For the Novices who remain in the Novice Class Only it is requested that Past Phone Band be re-instated as from the era of the 1950's to 1970's.

All Novices would regain there voice & data mode's from 145.000 Mhz to 147.000 Mhz with a RF Power Limit of 40 Watts Output, or a ERP not to exceed 75 Watts.

All Novices & Technicians Class Licensees with the "CW Code Credit would also be permitted to operate a new additional sub band of 10 Meters. The suggested area of operation would be 28.500 Mhz to 28.800 Mhz with a "all normal HF mode's" The RF Power Requirement would be not more than 40 Watts RF Output, or a ERP not to exceed 250 Watts. The lower power limits would not be applied to other classes operating on the 10 meter band in the novice sub bands.

The "Technicians" with the noted "Conditional Merit 8 Service" upgrade would be permitted The entire 2 meter Band, and all mode. Would have all mode's above 50 Mhz!

All Novices would also regain the use of the 51.000 Mhz to 52.000 Mhz Band with all Mode. The RF Power Limit would be a maximum of 40 Watts Output, or a ERP of 75 Watts.

The Advanced Class Merit Conversion's to Extra would allow all normal Extra privileges, however the FCC could revert the license back to Advanced upon on a serious FCC violation.

The FCC would also Allow any lapses in the license for Military Time that interrupted the renewal while the ham radio operator was in State or Federal Military Service. This time must be accounted and proved by letters and documents submitted to the VEC / VE relayed to the FCC licensing bureau.

The wording "No Serious FCC Violation" would apply to all parts of the Communications Regulations under what the FCC has control. If there was a serious violation in some other sub part the application would be rejected.

The Chief of the WTB, The Enforcement Chief of Amateur Radio, and the FCC district EIC could make FCC policy without formal rule making by drafting reasonable guidelines for the application. The only appeal for a rejected merit application would be under the guidelines of Information the Government has is in error only!

This rule making request input from the public as to additional restrictions, or limitations to this process is requested. Perhaps from public input credit may be extended to **Less** than 15 years if the ham operator applying for the merit application may have had M.A.R.S., F.E.M.A., U.S. Coast Guard Aux. Civil Air Patrol, or a Commercial Radio Telephone or Telegraph License.

There is also an issue of age in the matter of conversion. I would hope that the FCC would also be extending this Merit conversion to all applicants of the Novice or Advanced Classes who have passed the age of +62 of age. The application still should go through a authorized VEC & VE system and the fee should also be required. The issues on how this should work should be made up from input from the ham community

The object is to give some voice & data modes so that current novices can work a public service & public safety events. The additional object is to start to make reasonable merges of the sub bands between Advanced and Extra class licensee's to end some minor confusion. Long time merit for the fellows who took much harder test of the 1st that was overlooked in the re-draft of the rules in 1989 / 1990 & 1999 / 2000 review by the commission was so the issue.

Special rule for the requested "Conditional Technician Noted Licenses" This noted condition would not allow them to become VE's or Club Station or Repeater Operators / Managers. The only way is through the VE testing to overcome this additional restriction.

In real emergencies the Novices need real voice communications on VHF in 2 meters and 6 meters like in the past. This is goal to have some voice and data needs to the thousands who hold this license.

Respectfully Submitted,

Dale E. Reich 